UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

UNITED STATES OF AMERICA,

Plaintiff,

JOHN DOE,

Plaintiff-Intervenor,

Case No. 2:22-cv-157

v.

STEVE'S TOWING, INC.,

Defendant.

NOTICE OF SETTLEMENT

The United States hereby advises the Court that the parties have reached an agreement in principle to settle this action brought pursuant to the Servicemembers Civil Relief Act ("SCRA"), 50 U.S.C. § 3901 *et seq.* The following additional information is provided for the Court's benefit:

- 1. The agreement in principle to settle this action is via a proposed Consent Order that contains, *inter alia*, provisions regarding injunctive relief, compliance with the SCRA on an ongoing basis, and monetary payments.
- 2. Once the parties have finalized the language in the proposed Consent Order, the parties will submit an agreed-upon proposed Consent Order to the Court, along with an accompanying brief in support of entry of the Consent Order.
- 3. The parties have conferred and respectfully request that the trial in this matter set to begin September 6, 2023, be removed from this Court's trial docket, pending submission of the

proposed Consent Order, and that the Court stay the deadlines set forth in its prior Scheduling Orders (ECF Nos. 13 & 19).

Respectfully submitted,

UNITED STATES OF AMERICA

JESSICA D. ABER United States Attorney

By: /s

Deirdre G. Brou, Assistant U.S. Attorney Office of the United States Attorney 2100 Jamieson Avenue

Alexandria, VA 22314 Phone: (703) 299-3770 Fax: (703) 299-3983

Email: deirdre.g.brou@usdoj.gov

Sean D. Jansen, Assistant U.S. Attorney Virginia State Bar No. 82252 Office of the United States Attorney 101 West Main Street, Suite 8000 Norfolk, VA 23510-1671

Phone: (757) 441-6331 Fax: (757) 441-6689

Email: sean.jansen@usdoj.gov

ATTORNEYS FOR UNITED STATES OF AMERICA